

R E M A R K S

1. Reconsideration and further prosecution of the above-identified application are respectfully requested in view of the discussion that follows. Claims 1-25 are pending in this application. Claims 21 have been objected to for lack of antecedent basis. Claims 1-25 have been rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 4,737,983 Frauenthal et al. After a careful review of the claims, it has been concluded that the rejection is in error and are, therefore, traversed.

2. Claims 21 has been objected to for lack of antecedent basis. In response, claim 21 has been amended to clarify the antecedent linkages.

3. Claims 1-25 have been rejected as being anticipated by Frauenthal et al. In particular, the Examiner asserts that

"Frauenthal discloses an automatic call distributor telephone service (column 1, lines 6-10), which reads on claimed 'a method of reducing messages traffic among peripherals of an automatic call distributor', such method comprising the steps of: forming a message table (300 on FIG. 3) in a first peripheral (306 on FIG. 3) of the automatic call distributor (column 5, lines 8-21) [The table contains a listing of ACDs for this customer]; and forwarding a message (column 5, lines 46 'the CCIS message') from the first peripheral to a second peripheral (334 on FIG. 3) of the automatic call distributor based upon a content of the message table (column 5, lines 34-51) [The CDS node follows one of the branches depending on the pointer in the table]."

It is noted first that the claims are limited to the method step of (and apparatus for) "forwarding a message received

by the first peripheral from a source peripheral to a second peripheral of the automatic call distributor based upon a content of the message table". It is believed in this regard that Frauenthal et al. fails to provide any teaching or suggestion of this claim element.

For example, Frauenthal et al. is drawn to routing calls, not messages (Frauenthal et al.: col. 4, lines 50-54; col. 6, lines 18-20). In this regard Frauenthal et al. explicitly states that "FIG. 3 . . . shows the logical flow of a program stored at data base 110 which is executed to determine the routing of this call in response to a CCIS message arriving at the data base 110" (Frauenthal et al., col. 4, lines 49-54).

Further, rather than forwarding CCIS messages, Frauenthal et al. decides where to route a call and forms a new set of messages to route the call. In this regard, "to route the call to POTS number 5 . . . this decision is translated into instructions which are returned through the CCIS network to the telephone office" (Frauenthal et al., col. 5, line 65 to col. 6, line 2).

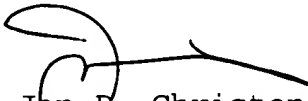
Since Frauenthal et al. routes calls or translates instructions, instead of forwarding messages, it clearly does not function in any manner that is the same or similar to that of the claimed invention. Since Frauenthal et al. is fundamentally different than that of the claimed invention, the rejection is believed to be improper and should be withdrawn.

4. Allowance of claims 1-25, as now presented, is believed to be in order and such action is earnestly solicited. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, she is respectfully requested to telephone applicant's undersigned attorney.

Respectfully submitted,

WELSH & KATZ, LTD.

By



Jon F. Christensen
Registration No. 34,137

July 23, 2003
WELSH & KATZ, LTD.
120 South Riverside Plaza
22nd Floor
Chicago, Illinois 60606
(312) 655-1500